REMARKS

This amendment is responsive to the Office Action dated October 6, 2003.

Claims 29-42 are currently pending, all of which have been amended in scope because of amendments to all of the independent claims, specifically claims 29, 33, 36, 40, 41 and 42. Reconsideration is respectfully requested in view of the present form of the claims and the following comments.

With respect to claims 29-32, the recitation of identifying at least one group of callers on the basis of digit totals constitutes a technique for classifying or identifying a specific group of callers. Respectfully, the operation is significantly distinct from merely employing a check sum to verify a caller as taught by Foster. Accordingly, reconsideration is respectfully requested in that regard. Note that the claims have been cosmetically amended by amendment of the single independent claim 29.

With respect to these claims, it is further noteworthy that the Szlam patent ('911) is primarily directed to a system wherein operator's process callers with limited computer back up. In that regard, note that the "updating" referred to at col. 11, line 10, involves operator entries. Claim 29 specifies computer operation to "update callers' files that maintain a historical record for each caller."

Claims 33-35 similarly involve the recitation of identifying a group of callers by digit assignments "that always total a specific particular numerical value." The distinction was treated above and is submitted to be applicable with respect to these claims. With respect to sequencing operations, claim 33 specifies the sequencing of "transactions." On the contrary, the Riskin '267 patent provides that call record journals are "sequenced according to advertiser, product ..." etc. Also, at line 47, sequential control is mentioned. However, on the context of assigning sequence numbers to new callers, sequence does not involve "transactions," which has been found to be very significant, but rather involves sequence based on the time of an initial call by a caller and is assigned to callers. Thus, the sequence functions stated in the claims are quite distinct.

Regarding the claims 36-42, the distinctions considered above also come into play; along with the distinctions mentioned in the Office Action, which are bridged by various combinations.

However, in view of bridging questions, and the above distinctions, reconsideration is respectfully requested.

Applicant appreciates the comprehensive office action and urges the Examiner to reconsider her rejections in view of the above amendments and arguments. Favorable consideration and allowance of the claims pending here is respectfully requested.

Respectfully submitted,

Dated: April 6, 2004
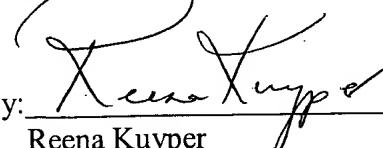
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